

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CF 18-251 DWF/KMM

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)(B)

v.

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2252(b)(2)

CHASE MACAULEY ALEXANDER,

18 U.S.C. § 2253(a)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Receipt of Child Pornography)

On or about June 6, 2017, in the State and District of Minnesota, the defendant,

CHASE MACAULEY ALEXANDER,

did knowingly receive visual depictions using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit, the following computer files:

- a. **03743f7e2ec126453389d303db7688d8 - tara oral compilation.wmv**, which depicts a prepubescent female child performing oral sex on an adult male; and
- b. **3b1e7fe1a3b6f8d1ef20c3dba94e47b9 - cumshot girl man masturbation music oral petting pthc sound vicky.mpg**, which depicts a prepubescent female child performing oral sex on an adult male,



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all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 2

(Receipt of Child Pornography)

On or about June 8, 2017, in the State and District of Minnesota, the defendant,

CHASE MACAULEY ALEXANDER,

did knowingly receive visual depictions using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit, the following computer files:

- a. **2crazygurls1_02 (webcam girl).flv**, which depicts a prepubescent female child exposing her genitals and masturbating in front of a web cam; and
- b. **08477c53f5609b2f1d5a4d9f59715f47 - girl ptsc webcam.flv**, which depicts a prepubescent female child exposing her genitals and masturbating in front of a web cam,

all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 3

(Distribution of Child Pornography)

On or about July 18, 2017, in the State and District of Minnesota, the defendant,

CHASE MACAULEY ALEXANDER,

did knowingly distribute a visual depiction using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depiction involved

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the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit: a computer video file titled **2012 anal girl man pthc sound.wmv**, which depicts an adult male penetrating the anus of a prepubescent female child with his penis, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 4

(Possession of Child Pornography)

On or about October 2, 2017, in the State and District of Minnesota, the defendant,

CHASE MACAULEY ALEXANDER,

did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer video files which depict the rape, and torture of a female toddler:

- a. **DD-bdsm2.mp4;**
- b. **Lux_Leak 4.mp4;**
- c. **Pthc OPVA 2013 Rape Ultrrrra.mp4;** and
- d. **Lux_Leak 3.mp4,**

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

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FORFEITURE ALLEGATIONS

Counts 1-4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of any of the foregoing offenses, the defendant,

CHASE MACAULEY ALEXANDER,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to the following:

- a. a 250GB Samsung SSD, s/n S2R5NX0HB19472N;
- b. a 160GB SATA Seagate hard drive, s/n 5LS8F9V7;
- c. a 1TB SATA Western Digital hard drive, s/n WX41A74FZJDX; and
- d. a 60GB SATA Hitachi hard drive, p/n 0A27463.

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If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2), and 2253(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON